

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY  
LITIGATION

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)  
) MDL No. 1:13-md-2419-RWZ  
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)  
)

This Document Relates to:  
All Cases

**NOTICE OF CHAPTER 11 TRUSTEE'S MOTIONS FOR BANKRUPTCY  
COURT APPROVAL OF SETTLEMENTS WITH NECC "INSIDERS", NECC  
INSURERS, AND GDC PROPERTIES MANAGEMENT, LLC AND ITS INSURER**

**PLEASE TAKE NOTICE** that, on May 6, 2014, Paul D. Moore, Chapter 11 Trustee (the "Trustee") of New England Compounding Pharmacy, Inc., d/b/a New England Compounding Center ("NECC") in NECC's Chapter 11 Case No. 12-19882-HJB, filed with the United States Bankruptcy Court for the District of Massachusetts, Eastern Division (the "Bankruptcy Court") the following motions:

1. *Chapter 11 Trustee's Motion to Compromise Controversies and to Approve Plan Support and Funding Agreement, and Related Escrow Agreement, With Certain Insiders and Affiliates of Debtor* [Bankr. Dkt. No. 712];
2. *Chapter 11 Trustee's Motion to Approve Compromise of Controversies and Settlements With Pharmacists Mutual Insurance Company and Maxum Indemnity Company* [Bankr. Dkt. No. 713];  
and
3. *Chapter 11 Trustee's Motion to Approve Compromise of Controversies and Insurance Settlement and Release Agreement With GDC Properties Management, LLC, Its Insurer and Certain of its Insiders* [Bankr. Dkt. No. 714].

Copies of the motions and related documents (collectively, the "9019 Motions") are attached hereto as **Exhibits A through C**, respectively.

**PLEASE TAKE FURTHER NOTICE** that, in connection with the 9019 Motions, the Trustee also filed a *Motion for Order Designating Manner of Service of 9019 Motions and Approving Form and Manner of Service of Notice of Hearings on 9019 Motions* (the "Notice Motion") [Bankr. Dkt. No. 715]. Pursuant to the Notice Motion, the Trustee seeks entry of an order of the Bankruptcy Court that notice will be deemed sufficient, and no other or further notice will be required or deemed necessary, if the Trustee causes notice to be provided as follows:

1. By serving full copies of the 9019 Motions upon those parties who will receive electronic notice through the Bankruptcy Court's Electronic Case Filing ("ECF") system, as well as upon counsel for those parties who have filed appearance in these cases, by filing these 9019 Motions and the form of notice approved by the Bankruptcy Court (the "Notice of Hearing") through this Court's ECF system; and
2. By serving all other known creditors, by first class mail, the Notice of Hearing, which shall include links to the website maintained by the Trustee's noticing agent, Donlin, Recano & Company, Inc. ("DRC"), such that any such creditor may download copies of the 9019 Motions at no additional charge. The Notice of Hearing also shall provide that such creditors may obtain paper copies upon written request to DRC or the Trustee's counsel.

Dated: May 6, 2014

Respectfully submitted,

DUANE MORRIS LLP

/s/ Michael R. Gottfried  
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Trustee of New England Compounding  
Pharmacy, Inc. d/b/a New England  
Compounding Center*

**Certificate of Service**

I, Michael R. Gottfried, hereby certify that on May 6, 2014, I caused a copy of the foregoing document, which was filed using this Court's ECF system, to be served electronically upon those parties registered to receive ECF service.

/s/ Michael R. Gottfried

Michael R. Gottfried